

THE HONORABLE ROBERT J. BRYAN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

LAWRENCE HARTFORD, et al.,
PLAINTIFF,

vs.

BOB FERGUSON, et al.
DEFENDANTS.

No. 3:23-cv-05364-RJB

MOTION FOR LEAVE TO FILE
BRIEF AMICI CURIAE
ON BEHALF OF WASHINGTON GUN
RIGHTS AND
THE AMERICAN FIREARMS
ASSOCIATION
IN SUPPORT OF PLAINTIFFS'
MOTION FOR PRELIMINARY
INJUNCTION

MOTION

Amici Curiae respectfully move for leave to file a brief in support of the Plaintiffs' motion for preliminary injunction under Federal Rule of Civil Procedure 65(a). *See* ECF No. 10. A copy of the proposed memorandum is attached as Exhibit A to this motion.

No party's counsel authored any part of the brief, nor have any party or their counsel contributed money intended to fund the preparation or submission of the brief. No person other than *amici* and their members contributed any money intended to fund the preparation or submission of the brief.

As grounds for this filing, *amici* state as follows:

1. Washington Gun Rights (WGR) is a nonprofit organized under section 501(c)(4) of the Internal Revenue Code. WGR is dedicated to preserving Washingtonians' Second Amendment rights through advocacy, legislative action, and participating in important cases before the courts. WGR has supported the protections of the Second Amendment to the U.S. Constitution through grassroots advocacy and engagement with Washington policymakers.

2. The American Firearms Association is a nonprofit organized under section 501(c)(4) of the Internal Revenue Code. The American Firearms Association supports the Second Amendment nationwide through engagement with lawmakers, public advocacy, and participating in important court cases.

3. *Amici* have a strong interest in participating in this case because they are membership organizations made up of Washingtonians and citizens of many other states. This case is important to the development of coherent and constitutionally faithful Second Amendment doctrine. *Amici* zealously adhere to the Second Amendment as fundamental protections of a vital individual right.

4. *Amici* will assist the Court by raising arguments not raised by the Plaintiffs' motion for preliminary injunction. This includes important ramifications for public safety for Washingtonians, as well as discussing how the law will affect their Second Amendment rights.

5. Consent was requested from all parties involved in the case. Plaintiffs counsel neither gave nor denied consent and stated this brief would be unopposed. Attorneys

1 for the Attorney General's office of Washington and the Alliance for Gun
2 Responsibility denied consent, citing FRAP 29(a)(6), which covers briefs filed at
3 federal appellate courts.

4 Accordingly, *Amici* respectfully request that this Court grant leave to file the
5 an *amici curiae* brief for consideration.

6 DATED: Friday, May 19, 2023.

ANGUS LEE LAW FIRM, PLLC

TREVOR BURRUS

/s/ D. Angus Lee

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